

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

TF-0014/MP  
February 27, 2024  
9:00 AM

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IN RE:

Case No. 23-35453-CGM-13

GLENN ROBERT FREDRIKSEN &  
ANGELA FREDRIKSEN,

Hon. CECELIA G. MORRIS

**NOTICE OF MOTION**

Debtors.  
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PLEASE TAKE NOTICE, that upon the within application, the Chapter 13 Trustee will move this court before the Honorable Cecelia G. Morris, U.S. Bankruptcy Judge, at the United States Bankruptcy Court, VIA ZOOM on the 27th day of February, 2024 at 9:00 AM, or as soon thereafter as counsel can be heard, for an Order pursuant to 11 U.S.C. §1307(c) for cause, dismissing this Chapter 13 case and for such other and further relief as may seem just and proper.

**PLEASE TAKE FURTHER NOTICE, that any hearing on the within application will be held by telephone or Zoom video conference only. No in-person hearing will be held in the Courthouse. Participants are required to register their appearance at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl> 48 hours before the scheduled hearing.**

Responsive papers shall be filed with the Bankruptcy Court and served upon the Chapter 13 Trustee, Thomas C. Frost, Esq., no later than seven (7) days prior to the hearing date set forth above. Any responsive papers shall be in conformity with the Federal Rules of Civil Procedure and indicate the entity submitting the response, the nature of the response and the basis of the response.

Date: White Plains, New York  
February 8, 2024

/s/ Thomas C. Frost  
THOMAS C. FROST, CHAPTER 13 TRUSTEE  
399 KNOLLWOOD ROAD, STE 102  
WHITE PLAINS, NY 10603  
(914)328-6333

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GLENN ROBERT FREDRIKSEN &  
ANGELA FREDRIKSEN,

Hon. CECELIA G. MORRIS

Debtors.  
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**APPLICATION**

TO THE HONORABLE CECELIA G. MORRIS, U.S. BANKRUPTCY JUDGE:

THOMAS C. FROST, ESQ., Standing Chapter 13 Trustee in the above-captioned estate, respectfully represents the following:

1. The Debtor filed a petition under the provisions of 11 U.S.C. Chapter 13 on May 31, 2023 and, thereafter, THOMAS C. FROST was duly appointed and qualified as Trustee.
2. The debtor has failed to submit timely Chapter 13 plan payments to the Trustee as required by 11 U.S.C. §1325(a)(6) and is in arrears, to date, in the amount of \$9,700.00.
3. The deficiencies as stated above impede the Trustee's ability to administer this case and, therefore, is a default that is prejudicial to the rights of the creditors of the Debtor pursuant to 11 U.S.C. §1307(c)(1).
4. The foregoing constitutes cause to dismiss this Chapter 13 case within the meaning of 11 U.S.C. §1307(c).

WHEREFORE, the Chapter 13 Trustee respectfully requests that this Court enter an Order dismissing this Chapter 13 case and for such other and further relief as may seem just and proper.

Dated: White Plains, New York  
February 8, 2024

/s/ Thomas C. Frost  
Thomas C. Frost, Chapter 13 Trustee

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
IN RE:

Case No: 23-35453-CGM-13

GLENN ROBERT FREDRIKSEN &  
ANGELA FREDRIKSEN,

**CERTIFICATE OF SERVICE  
BY MAIL**

Debtors.

-----x

This is to certify that I, Gent Grishaj, have this day served a true, accurate and correct copy of the within Notice of Motion and Application by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

GLENN ROBERT FREDRIKSEN  
176 MYRTLE AVENUE  
MAHOPAC FALLS, NY 10542

ANGELA FREDRIKSEN  
176 MYRTLE AVENUE  
MAHOPAC FALLS, NY 10542

SCOTT J. GOLDSTEIN, ESQ.  
WENARSKY AND GOLDSTEIN, LLC  
410 ROUTE 10 WEST, STE 214  
LEDGEWOOD, NJ 07852

JOSHUA E. KIMERLING, ESQ.  
CUDDY & FEDER, LLP  
445 HAMILTON AVENUE  
14TH FLOOR  
WHITE PLAINS, NY 10601

This February 8, 2024

/s/Gent Grishaj  
Gent Grishaj, Paralegal  
Office of the Standing Chapter 13 Trustee  
Thomas C. Frost, Esq.  
399 Knollwood Road, Suite 102  
White Plains, New York 10603  
(914) 328-6333

CASE NO: 23-35453-CGM-13  
Hon. CECELIA G. MORRIS

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

GLENN ROBERT FREDRIKSEN &  
ANGELA FREDRIKSEN,

Debtors.

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**NOTICE OF MOTION, APPLICATION  
and  
CERTIFICATE OF SERVICE**

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**THOMAS C. FROST  
STANDING CHAPTER 13 TRUSTEE  
399 KNOLLWOOD ROAD, SUITE 102  
WHITE PLAINS, NEW YORK 10603  
(914) 328-6333**

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